

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION, *as assignee of individuals who are Covered Persons*, JANE DOE-1, *a law enforcement officer*, JANE DOE-2, *a law enforcement officer*, EDWIN MALDONADO, SCOTT MALONEY, JUSTYNA MALONEY, PATRICK COLLIGAN, PETER ANDREYEV, and WILLIAM SULLIVAN : CIVIL ACTION NO. 2:24-CV-04269 : APPLICATION FOR EXTENSION OF TIME PURSUANT TO LOCAL FEDERAL RULE 6.1

Plaintiffs

V.

THOMSON REUTERS CORPORATION, THOMSON REUTERS HOLDINGS INC., THOMSON REUTERS CANADA LIMITED, THOMSON REUTERS APPLICATIONS INC., RICHARD ROES 1-10, *fictitious names of unknown individuals*, and ABC COMPANIES 1-10, *fictitious names of unknown entities*,

Defendants

Application is hereby made pursuant to Local Federal Rule 6.1 for a Clerk's Order extending time within which Defendants Thomson Reuters Corporation, Thomson Reuters Holdings Inc., Thomson Reuters Canada Limited, and Thomson Reuters Applications Inc., (collectively the "Defendants") may answer, move or

otherwise respond to the Complaint filed by Plaintiffs Atlas Data Privacy Corporation, Jane Doe-1, Jane Doe-2, Edwin Maldonado, Scott Maloney, Justyna Maloney, Patrick Colligan, Peter Andreyev, and William Sullivan (“Plaintiffs”), and it is represented that:

1. Plaintiffs filed their Complaint on February 15, 2024.
2. Thomson Reuters Holdings, Inc. was served February 26, 2024.
3. Thomson Reuters Applications Inc. was served February 26, 2024.
4. The remaining Defendants have yet to be served.
5. Defendants filed a Petition for Removal with this Court pursuant to 28 U.S.C. § 1446 on March 27, 2024. The petition was filed within “thirty (30) days after receipt by or service on that defendant of the initial pleading or summons.” 28 U.S.C. § 1446(b).

6. Defendants did not answer, move or otherwise reply to the Complaint in state court. Pursuant to Fed. R. Civ. P. 81(c)(2), Defendants’ response to the Complaint is due within the longest of these periods: “(A) 21 days after receiving—through service or otherwise—a copy of the initial pleading stating the claim for relief; (B) 21 days after being served with the summons for an initial pleading on file at the time of service; or (C) 7 days after the notice of removal is filed.”

7. Accordingly, Defendants’ response to the Complaint is due 7 days after March 27, 2024 – the longest period provided under Rule 81(c) – or April 3, 2024,

which date is determined under Fed. R. Civ. P. 6(a). Thus, Defendants' time to answer or otherwise respond has not yet expired.

8. No similar extensions of time to respond to this pleading has been obtained by Defendants.

9. Defendants request, pursuant to L.Civ.R. 6.1(b), that the Clerk enter an Order extending the time in which Defendants' may answer, move or otherwise respond to the Complaint by 14 days or until April 17, 2024.

Dated: April 1, 2024

Respectfully submitted,

BALLARD SPAHR, LLP

/s/ Marcel S. Pratt

Marcel S. Pratt

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